

# EXHIBIT 21

## RESPONSE TO OMNIBUS OBJECTION

### I. CONTACT INFORMATION

Name [handwritten:] Gladys Santos Martínez

Mailing Address Box 46 Mercedita, PR 00715

Contact Phone Number Home 787-290-0177 Cell 787-918-0177

Claim Number # 194107

II. Proceedings 174107

#### A. Clerk's Office

United States District Court  
Room 150 Federal Building  
San Juan Puerto Rico 00918-1767

#### B. Commonwealth of Puerto Rico et al. (Debtors)

#### C. Case Number: 17 BK 3283 – LTS

#### D. Omnibus Objection relating to request for money not paid by the Commonwealth of Puerto Rico:

Proof of claim numbers:

*Act 124 – July – 1973 – Pay raise*

#49762 – Act 89 – Romerazo – Effective July 1, 1995

*Act 89 – July – 1979 – Uniform compensation*

#94057 – June 6, 2008 Pay Scale Act – Step increases

#98821 – Act 98 (2002) of Dr. Pedro Rosello – effective July 2002

Act 164 (2004) of Ms. Sila Calderón – effective January 2004

#### III. The court should not grant the Omnibus Objection, because these amounts are owed based on the following laws passed by the government of the Commonwealth of Puerto Rico:

*Act 124 July 1973 Pay Raise*

Act 89 “Romerazo” – Effective July 1, 1995

*Act 89 – 1979 Uniform Compensation*

June 6, 2008 Pay Scale Act – Step increases

Act 98 (2002) of Dr. Pedro Rosello – effective July 2002

Act 184 (2004) of Ms. Sila M. Calderón, effective January 2004

IV. Supporting Documentation

Enclosed are documents evidencing the years of service with the Puerto Rico Telephone Company, Ponce, Puerto Rico from the 21<sup>st</sup> of August of 1972 through through of July 1, 2002 of \_\_\_\_\_. I ended my career as a test man at the Puerto Rico Telephone Company, Ponce, Puerto Rico, Commonwealth. Claim is made under the applicable laws that cover these years of ~~educational~~ service.

Enclosed are documents as evidence of this claim.

Due to the recent emergency situation in Puerto Rico caused by earthquakes and COVID-19, the responses are being sent on this date. Please contact me if any additional information or documentation is needed.

Gladys Santos Martínez

Printed name

[signature] \_\_\_\_\_, Feb 4, 2002

Signature

PS

*The PR Telephone Co. was an agency of the government of P.R. until 1999, when the governor in office at the time sold it. The basis of my claim relates to money owed for pay raises under laws that were signed during the years that the PRTC belonged to the government of P.R.*

*Thank you  
for your attention  
to this matter,  
[cancelled]*

Case:17-03283-LTS Doc#:20061-1 Filed:02/07/22 Entered:02/07/22 17:11:18 Desc:



PRT/CLARO  
P.O. Box 360998  
San Juan PR 00936-0998

### **CERTIFICATION**

**GLADYS SANTOS MARTINEZ**

**XXX-XX-8193**

For the former employee referenced above, we certify the following:

- She joined PRT/Claro effective August 21, 1972.
- She worked as a regular employee through July 1, 2002.

This certification confirms that the information was obtained from our personnel information system. In Guaynabo, Puerto Rico, on Friday, June 19, 2020.

Abigail Alejandro González  
Abigail Alejandro González  
Compensation Officer  
Compensation and Records

Gladys Santos Martinez  
Box 46 Mercedita  
P.R. 00715



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Clerk's Office  
United State District Court  
Room 150 Federal Building  
San Juan, P.R. 00918-1767



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### TRANSLATOR'S CERTIFICATE OF TRANSLATION

Translation from: Spanish (Puerto Rico) into English (US)

TARGEM Translations Inc.

I, Andreea I. Boscor, ATA-certified Spanish-English #525556, acting as translator at TARGEM Translations Inc., a NEW YORK City corporation, with its principal office at 185 Clymer Street, Brooklyn, NY, 11211, USA, certify that:

the English translated document is a true and accurate translation of the original Spanish and has been translated to the best of my knowledge.

Original Document Name: **Claim No. 174107 DN 20061**

Signed this 27<sup>th</sup> of May 2022



Verify at [www.atanet.org/verify](http://www.atanet.org/verify)

A handwritten signature in blue ink, appearing to read "Andreea I. Boscor".

Andreea I. Boscor

